

HONORABLE KYMBERLY K. EVANSON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SHENZHEN ROOT TECHNOLOGY CO.,
LTD., HONG KONG LUTE
TECHNOLOGY CO., LIMITED, AND
SHENZHEN CONGLIN E-COMMERCE
CO., LTD.,

Plaintiffs,

v.

CHIARO TECHNOLOGY LTD.,

Defendant.

CHIARO TECHNOLOGY LTD.,

Counterclaim Plaintiff,

v.

SHENZHEN ROOT TECHNOLOGY CO.,
LTD., HONG KONG LUTE
TECHNOLOGY CO., LIMITED,
SHENZHEN CONGLIN E-COMMERCE
CO., LTD., SHENZHEN ROOT E-
COMMERCE CO., LTD., SHENZHEN
TPH TECHNOLOGY CO., LTD.,
SHENZHEN LUTEJIACHENG
NETWORK TECHNOLOGY CO., LTD,
AND SHENZHEN JINRUIHANG
TECHNOLOGY CO., LTD.,

Counterclaim Defendants.

Case No. 2:23-cv-00631-KKE

JOINT STATUS REPORT

Ex. 3001
IPR2025-00560
Pg. 1/10 (incl. Ex. A)

Pursuant to the Court’s Order filed April 21, 2025 (Dkt. 158), Plaintiffs and Counterclaim Defendants Shenzhen Root Technology Co., Ltd., Hong Kong Lute Technology Co., Limited, Shenzhen Conglin e-Commerce Co., Ltd., Shenzhen Root E-Commerce Co., Ltd., Shenzhen Lutejiacheng Network Technology Co., Ltd., and Shenzhen Jinruihang Technology Co., Ltd. (collectively, “Momcozy”), Counterclaim Defendant Shenzhen TPH Technology Co., Ltd. (“TPH”), and Defendant and Counterclaim Plaintiff Chiaro Technology Ltd. (“Elvie”), and hereby submit this Joint Status Report.

On May 9, 2025, the United States Bankruptcy Court for the District of Delaware entered the attached order (Ex. A), automatically staying the current litigation. The parties will file a joint status report within 14 days of the bankruptcy court’s disposition of bankruptcy case and/or lifting the stay, whichever comes earlier.

Additionally, Defendant is concurrently filing a “Notice of Recognition of Foreign Insolvency Proceeding.”

So stipulated and agreed this 23rd day of May, 2025.

By: /s/ Jeremy E. Roller

Jeremy E. Roller (WSBA 32021)
jroller@aretelaw.com
ARÊTE LAW GROUP PLLC
600 University Street, Suite 2420
Seattle, WA 98101
Tel: (206) 428-3250 | Fax: (206) 428-3251

Carl E. Bruce (*pro hac vice*)
bruce@fr.com
Matthew A. Colvin (*pro hac vice*)
colvin@fr.com
FISH & RICHARDSON P.C.
1717 Main Street, Suite 5000
Dallas, TX 75201
Tel: (214) 747-5070 | Fax: (214) 747-2091

Kelly Del Dotto (*pro hac vice*)
allenspach.del.dotto@fr.com
FISH & RICHARDSON P.C.
222 Delaware Avenue, 17th Floor

Wilmington, DE 19801
Tel: (302) 652-5070 | (302) 652-0607

Attorney for Plaintiffs and Counterclaim-
Defendants, SHENZHEN ROOT
TECHNOLOGY CO., LTD., HONG KONG
LUTE TECHNOLOGY CO., LIMITED,
SHENZHEN CONGLIN E-COMMERCE CO.,
LTD., SHENZHEN ROOT E-COMMERCE
CO., LTD., SHENZHEN TPH
TECHNOLOGY CO., LTD., SHENZHEN
LUTEJIACHENG NETWORK
TECHNOLOGY CO., LTD, AND
SHENZHEN JINRUIHANG TECHNOLOGY
CO., LTD.

By: /s/ Mark P. Walters

Mark P. Walters (WSBA 30819)
walters@lowegrahamjones.com
LOWE GRAHAM JONES PLLC
1325 Fourth Avenue, Suite 1130
Seattle, WA 98101
Tel: (206) 381-3300 | Fax: (206) 381-3301

Nirav N. Desai (*pro hac vice*)
Josephine Kim (*pro hac vice*)
Alexander Covington (*pro hac vice*)
Alex Alfano (*pro hac vice*)
Joseph Kim (*pro hac vice*)
Paige Cloud (*pro hac vice*)
Michael Webb (*pro hac vice*)
Zachary L. Jacobs (*pro hac vice*)
Christopher Coleman (*pro hac vice*)
STERNE, KESSLER,

GOLDSTEIN & FOX PLLC
1101 K Street NW, 10th Floor
Washington, DC 20005
Tel: (202) 371-2600 | Fax: (202) 371-2540

Attorney for Defendant and Counterclaim-
Plaintiff, CHIARO TECHNOLOGY LTD.

By: /s/ Yan Song

Yan Song (WSBA 53611)
regina@aeonlaw.com

1 AEON LAW
2 1718 E. Olive Way
3 Seattle, WA 98102
4 Tel: (206) 271-2200

5 Philip P. Mann (WSBA 28860)
6 phil@mannlawgroup.com
7 MANN LAW GROUP PLLC
8 403 Madison Avenue N., Suite 240
9 Bainbridge Island, WA 98110
10 Tel: (206) 436-0900

11 Elliot C. Mendelson (*pro hac vice*)
12 emendelson@analectslegal.com
13 Tel: (312) 375-7844
14 Yichen Cao (*pro hac vice*)
15 ycao@analectslegal.com
16 Tel: (630) 386-5514
17 ANALECTS LEGAL LLC
18 1212 S Naper Boulevard, Suite 119, PMB 238
19 Naperville, IL 60540

20 Attorney for Counterclaim Defendant,
21 SHENZHEN TPH TECHNOLOGY CO., LTD.
22
23
24
25
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EXHIBIT A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHIARO TECHNOLOGY LIMITED (in
Administration),¹

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 25-10691 (BLS)

Related D.I. 5 & 17

**ORDER GRANTING MOTION OF THE FOREIGN
REPRESENTATIVES FOR RECOGNITION AND RELATED RELIEF**

Upon consideration of the *Motion of the Foreign Representatives for Recognition and Related Relief* [D.I. 5] (the “Motion”)² filed by Lindsay Hallam, Matthew Boyd Callaghan, and Oliver Wright of FTI Consulting LLP, in their capacity as the Foreign Representatives of the Foreign Debtor, for an order (this “Order”) recognizing the English Proceeding as a foreign main proceeding, and upon consideration of the Petition, the Memorandum of Law, the Davison Declaration and the Hallam Declaration, and after due and sufficient notice of the Motion,

THE COURT FINDS AND CONCLUDES AS FOLLOWS:

- a. This Court has jurisdiction over this matter under 28 U.S.C. §§ 157 and 1334;
- b. This is a core proceeding under 28 U.S.C. § 157(b)(2)(P);
- c. Venue is proper in this District under 28 U.S.C. § 1410;
- d. Notice of the hearing on the Motion was sufficient under the circumstances and no other notice of or hearing on the Motion is necessary;
- e. This chapter 15 case was properly commenced in accordance with section 1504 of title 11 of the United States Code (the “Bankruptcy Code”);

¹ The Foreign Debtor’s mailing address and principal place of business is 1 Brunswick Square, Bristol BS2 8PE, England.

² Capitalized terms used but not defined in this Order have the meaning provided in the Motion.

- f. The Petition meets all requirements of section 1515 of the Bankruptcy Code;
- g. The Foreign Representatives are each a “person” within the meaning of section 101(41) of the Bankruptcy Code and are the duly appointed foreign representatives of the Foreign Debtor within the meaning of sections 101(24) and 1517(a)(2) of the Bankruptcy Code;
- h. The English Proceeding was commenced in England, which is the location of the Foreign Debtor’s center of main interests, and, therefore, the English Proceeding is a foreign main proceeding within the meaning of section 1502(4) of the Bankruptcy Code;
- i. The English Proceeding is entitled to recognition as a foreign main proceeding because it meets the requirements of section 1517 of the Bankruptcy Code;
- j. Recognition of the English Proceeding as a foreign main proceeding is not contrary to the public policy of the United States;
- k. The Foreign Representatives and the Foreign Debtor are automatically entitled to all of the relief available under section 1520 of the Bankruptcy Code, without limitation;
- l. All relief granted in this Order is necessary to effectuate the purpose of chapter 15 of the Bankruptcy Code and to protect the assets of the Foreign Debtor and the interests of its creditors within the territorial jurisdiction of the United States; and
- m. The Court is authorized to grant the relief in this Order because the interests of creditors and other parties in interest, including the Foreign Debtor, are sufficiently protected under section 1522(a) of the Bankruptcy Code.

NOW, THEREFORE, IT IS HEREBY ORDERED:

1. The Motion is GRANTED as provided in this Order.
2. The English Proceeding is recognized as a foreign main proceeding under section 1517 of the Bankruptcy Code and given full force and effect.
3. All relief authorized under section 1520 of the Bankruptcy Code is applicable throughout this proceeding or until otherwise ordered by this Court, including, without limitation, the automatic stay under section 362 of the Bankruptcy Code.
4. Without limiting the generality of the relief granted in paragraph 3, this Order imposes a stay within the territorial jurisdiction of the United States applicable to all entities against:
 - (i) the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the Foreign Debtor that was or could have been commenced before the commencement of this chapter 15 case; the enforcement, against the Foreign Debtor or against property of the Foreign Debtor of a judgment obtained before the commencement of this chapter 15 case; any act to obtain possession of property of the Foreign Debtor or to exercise control over property of the Foreign Debtor; any act to create, perfect, or enforce any lien against property of the Foreign Debtor; any act to create, perfect, or enforce against property of the Foreign Debtor any lien to the extent that such lien secures a claim that arose before the commencement of this chapter 15 case; any act to collect, assess, or recover a claim against the Foreign Debtor that arose before the commencement of this chapter 15 case; the setoff of any debt owing to the Foreign Debtor that arose before the commencement of this chapter 15 case against any claim against the Foreign Debtor; and the commencement or continuation of a proceeding before the United States Tax Court concerning a tax liability of the Foreign Debtor, if the Foreign Debtor is considered a corporation for a taxable period the Court may determine.
 - (ii) The Foreign Representatives are granted the rights, powers, protections, privileges, and immunities of a trustee in a bankruptcy in the United States during this chapter 15 case. No action taken during this chapter 15 case by the Foreign Representatives, or their agents, representatives, advisors, or counsel, in preparing, disseminating, applying for, implementing, or otherwise acting in furtherance of or in connection with the English Proceeding, this Order, this chapter 15 case, any adversary proceeding, or any further proceeding commenced in this chapter 15 case shall be deemed to constitute a waiver of the immunity afforded such person under sections 306 or 1510 of the Bankruptcy Code.

5. Notwithstanding anything to the contrary contained herein, this Order shall not be construed as (a) enjoining the police or regulatory act of a governmental unit, including a criminal action or proceeding, to the extent not stayed pursuant to section 362 of the Bankruptcy Code, or (b) staying the exercise of any rights that section 362(o) of the Bankruptcy Code does not allow to be stayed.

6. The provisions of sections 363, 549, and 552 of the Bankruptcy Code apply to a transfer of an interest of the Foreign Debtor in property that is within the territorial jurisdiction of the United States to the same extent that those sections would apply to property of the estate. The right to transfer, encumber, or otherwise dispose of the Foreign Debtor's assets absent the express written consent of the Foreign Debtor is suspended under sections 1520(a) and 1521(a)(3) of the Bankruptcy Code.

7. The Foreign Representatives may exercise the rights and power of a trustee and are entitled to administer and realize all or part of the Foreign Debtors' assets within the territorial jurisdiction of the United States.

8. The Foreign Representatives are authorized to examine witnesses, take evidence, and seek the production of documents with respect to the Foreign Debtor, including the assets, affairs, rights obligations, and liabilities of the Foreign Debtor.

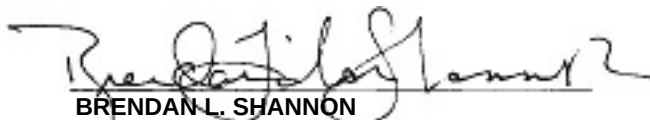
9. Notice of this Order shall be served in accordance with the *Order (A) Scheduling a Hearing on Chapter 15 Petition and Recognition and (B) Specifying Form and Manner of Service of Notice* [D.I. 15] and as otherwise required by the Bankruptcy Code, Bankruptcy Rules, or any order entered in this chapter 15 case by the Court. Service in accordance with this Order constitutes adequate and sufficient service and notice for all purposes.

10. All pleadings in this chapter 15 case shall be made available by the Foreign Representatives upon request in writing to its counsel, DLA Piper (US) LLP, 1201 N. Market Street, Suite 2100 Wilmington, Delaware 19801 (Attn: R. Craig Martin, Esq. [craig.martin@us.dlapiper.com] and Roxanne M. Eastes, Esq. [roxanne.eastes@us.dlapiper.com]), and 500 Eighth Street, N.W. Washington, DC 20004 (Attn: Erik F. Stier, Esq. [erik.stier@us.dlapiper.com]).

11. Notwithstanding any provision in the Bankruptcy Rules to the contrary, including but not limited to Bankruptcy Rules 7062 and 1018, (a) this Order shall be effective immediately and enforceable upon its entry; (b) the Foreign Representatives are not subject to any stay in the implementation, enforcement, or realization of the relief granted in this Order; and (c) the Foreign Representatives and the Foreign Debtor are authorized and empowered, and may in their discretion and without further delay, take any action and perform any act they deem necessary to implement and effectuate the terms of this Order.

12. This Court shall retain jurisdiction with respect to any matters, claims, rights, or disputes arising from or related to the Motion, the Petition, or the implementation of this Order.

Dated: May 9th, 2025
Wilmington, Delaware


BRENDAN L. SHANNON
UNITED STATES BANKRUPTCY JUDGE